



U.S. Department of Energy  
**Office of River Protection**

P.O. Box 450  
Richland, Washington 99352

02-OSR-0510

Mr. R. F. Naventi, Project Manager  
Bechtel National, Inc.  
3000 George Washington Way  
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF BECHTEL NATIONAL, INC.  
(BNI) AUTHORIZATION BASIS CHANGE NOTICE (ABCN) 24590-WTP-ABCN-ESH-02-  
025, REV. 0

- References:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval, Authorization Basis Change Notice 24590-WTP-ABCN-EST-02-026, Rev. 0, 'Authorization Basis Maintenance'," CCN 040383, dated October 8, 2002.
  2. ORP letter from R. Schepens to R. Naventi, BNI, "Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis," 02-OSR-0430, dated September 18, 2002.

The U.S. Department of Energy, Office of River Protection (ORP) has reviewed ABCN 24590-WTP-ABCN-ESH-02-025, Revision 0, in Reference 1. This ABCN provides changes to the authorization basis (AB) to implement RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis*. ORP provided Revision 9 to the Contractor for implementation in Reference 2. The authorization basis change also clarifies processes used by the RPP-WTP project to change the AB documents.

Based upon the information in Reference 1 and the attached Safety Evaluation Report (SER), except for three minor changes (identified in the SER) which were inconsistent with RL/REG-97-13, Revision 9, the ORP found the proposed changes identified in the above ABCN acceptable. The ORP concluded that there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected and they comply with applicable laws, regulations, and River Protection Project Waste Treatment and Immobilization Plant contractual requirements. Attached is the ORP's SER for the proposed changes.

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As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the SRD, identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days; i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the SRD, and subordinate documents must be modified to reflect the changes associated with this amendment.

If you have any questions, please contact me, or your staff may contact Walt Pasciak, Office of Safety Regulation, (509) 373-9189.

Sincerely,

OSR:WJP

Roy J. Schepens  
Manager

Attachment

**Safety Evaluation Report (SER)  
of Proposed Authorization Basis Change Notice (ABCN)  
ABCN-24590-02-025, Rev. 0  
to the Safety Requirements Document (SRD)  
for the River Protection Project Waste Treatment Plant (WTP)**

## **1.0 INTRODUCTION**

The WTP authorization basis is the composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the Office of River Protection (ORP) grants permission to perform regulated activities. The authorization basis for the WTP includes the SRD and the Integrated Safety Management Plan (ISMP). The SRD contains the approved set of radiological, nuclear and process safety standards and requirements, which if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. The ISMP defines a set of integrated activities that is directed toward the management or control of radiological, nuclear, and process hazards such that adequate protection is provided to workers, the public, and the environment. By letter dated October 8, 2002,<sup>1</sup> Bechtel National, Inc., (the Contractor) submitted a proposed amendment to the ISMP in the area of authorization basis change control. This SER documents the ORP evaluation of the changes proposed by the Contractor.

The amendment proposes changes to the ISMP to make it consistent with RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis*. The proposed changes allow the Contractor to make certain changes to the facility Authorization Basis without prior ORP review and approval. The Contractor must perform a safety evaluation prior to making the changes that demonstrates, among other things, that the changes are below a specified safety threshold. Also, the proposed changes allow the Contractor to modify the administrative controls Authorization Basis without prior ORP review and approval. In both cases the safety evaluation must show the following:

- Does not involve the deletion or modification of a standard previously identified or established in the approved SRD;
- Does not involve the modification of an approved TSR (only after Production Operations Authorization Agreement approval);
- Will continue to comply with all applicable laws and regulations, conform to top-level safety standards, and provide adequate safety;
- Will continue to conform to the contract requirements associated with the authorization basis document(s) affected by the revision; and

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<sup>1</sup> BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-025, Revision 0, 'Authorization Basis Maintenance'," CCN 040383, dated September October 8, 2002.

- Will not result in inconsistencies with other commitments and descriptions contained in portions of the authorization basis or an authorization agreement not being revised.

## 2.0 BACKGROUND

The WTP regulatory process involves multiple steps of Contractor submittals and specific regulatory actions. Contractor submittals provide the information and commitments that serve as the basis for regulatory decisions taken by the ORP in connection with regulatory actions and establish the authorization basis. The authorization basis started with the first round action, Standards Approval.

The authorization basis serves several functions following the completion of a specific regulatory action. The authorization basis describes the safety basis for the facility and is the benchmark used to evaluate the safety implications of changes made to a Contractor's facility design, operations, or administrative controls. The importance of the authorization basis to these ongoing activities and the need to maintain a credible safety basis for the facility, requires that the authorization basis be maintained.

The maturation of the Contractor's facility design and activities, and other changing conditions, result in a need to establish a process for the Contractor to efficiently make changes to the authorization basis. This process must balance the RPP-WTP regulatory principle of efficiency with assurance that adequate safety will not be compromised. The ORP position regarding Contractor-initiated changes was developed to conform with these program requirements and with the applicable portions of DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*. RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis*, describes methods acceptable to the ORP for evaluating and implementing Contractor-initiated changes to the authorization basis. After BNI and ORP reached agreement on its provisions, Revision 9 was recently revised by ORP and provided to the Contractor for implementation.<sup>2</sup> This ABCN provides the necessary changes to the authorization basis to implement Revision 9.

## 3.0 EVALUATION<sup>3</sup>

- 3.1 Proposed change to ISMP Section 3.3.3, fifth paragraph, item b: The current (Revision 8) wording for item b states that the AB is revised prior to the implementation of the proposed change. The proposed (Revision 9) wording states that the AB is revised or amended prior to the implementation of the proposed change.

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<sup>2</sup> ORP letter from R. Schepens to R. Naventi, BNI, "Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis," 02-OSR-0430, dated September 18, 2002.

<sup>3</sup> In several communications between BNI staff (M. Platt) and DOE staff (W. Pasciak) on October 10, 2002, BNI stated that they agreed with all the positions designated as "conditionally acceptable" described in Section 3.2 and 3.3 of this SER and agreed to withdraw the proposed changes that are inconsistent with RL/REG-97-13, Revision 9 described in Section 3.2 and 3.3.

Evaluation (Acceptable): RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis*, provides for making two types of changes to the AB, revisions and amendments. Revisions may be made without prior ORP review and approval, whereas amendments require prior ORP review and approval. The proposed change is acceptable because it is consistent with RL/REG-97-13, Revision 9.

- 3.2 Proposed change to ISMP Section 3.3.3.1, item a.1: Item a.1 addresses changes BNI may make to the facility without prior DOE approval. The proposed change provides the criteria the safety evaluation must meet for the facility changes to be made without prior DOE approval.

Evaluation (Conditionally Acceptable): Except for two changes, the proposed change is acceptable because it repeats the provisions of RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis* verbatim. The proposed change to item vi, to include the phrase “conform to the requirements of the SRD”, and to item viii, to change ‘commitments’ to ‘requirements’ are unacceptable because these changes are not consistent with RL/REG-97-13, Revision 9.

- 3.3 Proposed change to ISMP Section 3.3.3.1, item b.1: Item b.1 addresses changes BNI may made to the administrative controls without prior approval the DOE. The proposed changed wording provides the criteria the safety evaluation must meet for the administrative controls changes to be made without prior DOE approval.

Evaluation (Conditionally Acceptable): Except for one change, the proposed changes are acceptable because they repeat the provisions of RL/REG-97-13, Revision 9, *Office of River Protection Position on Contractor-Initiated Changes to the Authorization Basis* verbatim. The proposed change to item v, to change ‘commitments’ to ‘requirements’ is unacceptable because this change is not consistent with RL/REG-97-13, Revision 9.

- 3.4 Proposed change to ISMP Section 3.3.3.2, and Section 3.3.3.3: The proposed changes in these sections are editorial and clarify references to the changes made to items a and b of Section 3.3.3.1.

Evaluation (Acceptable): The proposed change is acceptable because they are for editorial and clarification purposes.

- 3.5 Proposed change to ISMP Section 13.0: Section 13.0 is the Reference section of the ISMP. This change is to reference the current revision, Revision 9 of RL/REG-97-13, rather than an earlier version.

Evaluation (Acceptable): The proposed change is acceptable because it updates the reference to the current revision.

#### **4.0 CONCLUSION**

On the basis of the considerations described above, ORP has concluded there is reasonable assurance that the health and safety of the public, the workers and the environment will not be adversely affected by the proposed changes that are approved. The proposed changes that are approved to the ISMP do not constitute a reduction in commitment or effectiveness.

Accordingly, the proposed changes in the area of authorization basis maintenance are acceptable, except for 3.3.3.1.a.1.vi and viii, and 3.3.3.1.b.1.v, which are unacceptable for the reasons described above.